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8 **BEFORE THE**
9 **RESPIRATORY CARE BOARD**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. R-2051

12 ROBERT T. COLLIER, RCP
1708 Lupine Drive
Willits, CA 95490

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

14 Respiratory Care Practitioner License No. 17554

15 Respondent.

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding that the following matters are true:

19 **PARTIES**

20 1. Stephanie Nunez (Complainant) is the Executive Officer of the
21 Respiratory Care Board of California. She brought this action solely in her official capacity and
22 is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of
23 California, by Catherine E. Santillan, Senior Legal Analyst.

24 2. Robert T. Collier (Respondent) is representing himself in this proceeding
25 and has chosen not to exercise his right to be represented by counsel.

26 3. On or about October 28, 1994, the Respiratory Care Board of California
27 issued Respiratory Care Practitioner License No. 17554 to Respondent. The License was in full
28 force and effect at all times relevant to the charges brought in Accusation No. R-2051 and will

1 expire on July 31, 2008, unless renewed.

2 JURISDICTION

3 4. Accusation No. R-2051 was filed before the Respiratory Care Board
4 (Board) , Department of Consumer Affairs, and is currently pending against Respondent. The
5 Accusation and all other statutorily required documents were properly served on Respondent on
6 January 26, 2007. Respondent timely filed his Notice of Defense contesting the Accusation. A
7 copy of Accusation No. R-2051 is attached as exhibit A and incorporated herein by reference.

8 ADVISEMENT AND WAIVERS

9 5. Respondent has carefully read, and understands the charges and allegations
10 in Accusation No. R-2051. Respondent also has carefully read, and fully understands the effects
11 of this Stipulated Surrender of License and Order.

12 6. Respondent is fully aware of his legal rights in this matter, including the
13 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
14 counsel, at his own expense; the right to confront and cross-examine the witnesses against him;
15 the right to present evidence and to testify on his own behalf; the right to the issuance of
16 subpoenas to compel the attendance of witnesses and the production of documents; the right to
17 reconsideration and court review of an adverse decision; and all other rights accorded by the
18 California Administrative Procedure Act and other applicable laws.

19 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
20 each and every right set forth above.

21 CULPABILITY

22 8. Respondent admits the truth of each and every charge and allegation in
23 Accusation No. R-2051, agrees that cause exists for discipline and hereby surrenders his
24 Respiratory Care Practitioner License No. 17554 for the Board's formal acceptance.

25 9. Respondent understands that by signing this stipulation he enables the
26 Board to issue an order accepting the surrender of his Respiratory Care Practitioner License
27 without further process.

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15. Respondent shall cause to be delivered to the Board both his License and wall certificate on or before the effective date of the Decision and Order.

16. Respondent fully understands and agrees that if he ever files an application for relicensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. R-2051 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

17. Respondent shall pay the Board cost recovery of \$1,118.25 (one thousand one hundred eighteen dollars and twenty five cents) prior to issuance of a reinstated license.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Respiratory Care Practitioner License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Respiratory Care Board.

DATED: March 20, 2007

Original signed by:
Robert T. Collier
Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Respiratory Care Board of the Department of Consumer Affairs.

DATED: March 26, 2007

EDMUND G. BROWN JR., Attorney General
of the State of California

JOSE R. GUERRERO
Supervising Deputy Attorney General

Original signed by:
CATHERINE E. SANTILLAN
Senior Legal Analyst

Attorneys for Complainant

**BEFORE THE
RESPIRATORY CARE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. R-2051

ROBERT T. COLLIER
1708 Lupine Drive
Willits, CA 95490

Respiratory Care Practitioner License No. 17554

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Respiratory Care Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on May 14, 2007.

It is so ORDERED May 4, 2007.

Original signed by:

LARRY L. RENNER, BS, RRT, RCP, RPFT,
PRESIDENT, RESPIRATORY CARE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA